

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE:

CHAPTER 11

DELPHI CORPORATION, et al.

Case No. 05-44481 (RDD)

Debtors.

(Jointly Administered)

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RESPONSE TO NOTICE OF OBJECTION TO CLAIM

CLAIMANT, ROOT INTERNATIONAL, INC., d/b/a CASES2GO (hereinafter "CLAIMANT"), files this Response to Notice of Objection to Claim, filed by DELPHI CORPORATION, and respectfully represents as follows:

1. On January 23, 2006, the Claimant filed a Proof of Claim, Claim No. 1641, seeking payment of a General Unsecured Claim in the amount of \$7,218.00.

2. The Claim was filed in the above case and in Case No. 05-44507, involving Debtor subsidiary, DELPHI MEDICAL SYSTEMS COLORADO CORPORATION (hereinafter "DELPHI MEDICAL SYSTEMS"), as per the attached Proofs of Claim, attached as Exhibit "A".

2. The Claimant's Claim arises from an agreement between Debtor subsidiary, DELPHI MEDICAL SYSTEMS, which company placed an order from the Claimant for thirty six (36) specialty cases at \$200.50 each for a total of \$7218.00.

3. The Claimant shipped the cases to DELPHI MEDICAL SYSTEMS on October 4, 2005 and the cases were received by DELPHI MEDICAL SYSTEMS.

4. On October 17, 2005, the Claimant forwarded an invoice to the DELPHI MEDICAL SYSTEMS requesting payment in the amount of \$7218.00, as agreed.

5. Claimant and DELPHI MEDICAL SYSTEM'S agreement and the shipment of the product is reflected on the Invoice attached hereto as Exhibit "B".

6. The Debtor's Ninth Omnibus Objection to the Claimant's Claim contends that the Claim is based on the objection that the Claim is subject to modification.

7. The Claim was correctly listed as an Unsecured Claim and was filed against the proper debtor.

8. Claimant is due the full value of the product shipped in the amount of \$7,218.00, which amount should not be modified.

9. The Claimant joins in this Response to Objection to Claim as per the attached acknowledgment.

WHEREFORE, the Claimant, ROOT INTERNATIONAL, INC., d/b/a CASES2GO, respectfully requests that the Court enter an order (a) granting payment of the Claimant's Claim in full as requested herein and (b) granting the Claimant such other and further relief as the court deems necessary.

Dated: March 14, 2007, Land O Lakes, Florida.

KUENZEL & LUTES, P.A.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that a true and correct copy of the foregoing has been furnished by UPS EXPRESS NEXT DAY DELIVERY, this 14<sup>th</sup> day of May, 2007, to the following: Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098, Attn: General Counsel and Counsel for Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606, Attn: John Wm. Butler, Jr., John K. Lyons, and Joseph N. Wharton.

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Diane V. Kuenzel, Esquire